

Complaint-generated response regarding dust emissions at fertilizer plant operating at Hickman's Egg Ranch in Arlington, AZ. Complainant stated dust emissions from unidentified equipment and from uncovered bulk storage piles.

Complaint response off-site from 0755 hrs to 0800 hrs. This complaint response commenced off-site at 0800 hrs. and on-site at 0840 hrs.; and detailed chronologically as follows:

From 0800 hrs to 0840 hrs:

I observed and photographed or recorded video of the following sources of visible emissions while off-site:

- 1) White dust emissions from loading operation at feed mill
- 2) Dust emissions from bulk material handling near screen at fertilizer plant
- 3) Dust emissions from stack on dust collector at propane dryer
- 4) Dust emissions from fertilizer loading operation

I prepared to document EPA Method 9 VE readings from #2, a non-continuous emission. No written VE observations of this particular activity were logged due to my initial observation of #2 had the fallout zone obscured by another bulk storage pile. I moved to northeast of my position off site but no further activity occurred for over 20 minutes.

I recorded video of loading operation in which a loader/lift was loading 1 ton bags of fertilizer into cargo area of haul truck. My recording force- stopped due to SD card memory limitation. Coincidentally, this particular activity ceased at this time as haul truck received last load of fertilizer, so no VE possible.

I parked in parking area for fertilizer plant along Ward Rd.

At 0829 hrs; I left a voice mail for permit contact, Francisco Ruiz 623-764-3878 informing of my complaint response.

At 0831 hrs; I telephoned Compliance Manager, Shari Yeatts at 623-692-8451 and informed her of my complaint response and observations. Ms. Yeatts stated she was unable to meet with me on site and suggested I contact Fertilizer Plant Operations Manager, Fernando Hoenig at 623-764-4758.

At 0840 hrs; I telephoned Mr. Hoenig who immediately met with me on site.

I explained to Mr. Hoenig the purpose of my inspection and my observations.

Mr. Hoenig made the following statements:

- a) The dust from the loading operation at the feed mill (#1) was soybean material
- b) Each bag of processed fertilizer contained approximately 2000 lbs. of fertilizer.

- c) The fertilizer is sold for \$165.00 per ton FOB (Freight on buyer), meaning not including any freight charges, which are the responsibility of the buyer. An estimated 45,000 tons are sold annually.
- d) The fertilizer bulk storage piles are required to be maintained at less than 12% moisture content to prevent the formation of pathogens. i.e. salmonella. *[I suggested tarping the bulk storage piles as a potential fugitive dust control measure, but enclosure would also be a potential effective control].*
- e) Dust and smoke emissions from the dust collector occur only at startup. *[I observed the emission from the stack at dust collector was 0% opacity at this time while the dryer was actively in operation.]*
- f) Many Hickman's Egg Ranch employees have received dust control training. *[Mr. Hoenig showed me his Comprehensive 310 Training accreditation at this time.]*
- g) Dust emissions observed from top of fertilizer silo could be abated by plugging; but caused caking of fertilizer which required frequent cleaning. *[I informed additional ECS (Emission Control Systems) may alleviate emissions.]*
- h) Dust emissions observed at bottom of silo had unknown point of emission. *[I was unable to identify specific point of emission either]*
- i) Composting activity and one Hickman's employee from south facility had been relocated to BioFlora north of Patterson Rd and West of Lewis Prison. Mr. Hoenig stated Luke Blotsky was his contact for BioFlora. Mr. Hoenig did not have an address for this facility.
- j) Compost is sold for \$35.00 per ton, with an estimated 5000 tons sold annually. Mr. Hoenig does not know any details of the business arrangements with BioFlora.

I informed Mr. Hoenig that I was commencing an investigation for a potential violation for operating the fertilizer plant without a permit. I informed Mr. Hoenig the composting operations at BioFlora may also be operating without a permit.

I photographed some of my observations on site; including silos, dryer, dust collector, cyclones.

I left the site.

At 0944 hrs; I telephoned Mr. Ruiz and informed him of my observations and potential for violation for operating without a permit.

Mr. Ruiz stated site has an ADEQ permit posted at the fertilizer plant and arranged to call me with the permit number due to potential applicability to my investigation.

At 1443 hrs; I telephoned Mr. Ruiz and informed him I would have update regarding my investigation, and telephone him on Thursday, August 14, 2014. Mr. Ruiz stated the posted ADEQ Permit 6363 is a permit to sell fertilizer.

At 1446 hrs; I telephoned Mr. Hoenig and informed him I would have update regarding my investigation, and telephone him on Thursday, August 14, 2014.

At 1448 hrs; I left voice message for Ms. Yeatts and informed her of the potential for a no-permit violation and informed her I would have update regarding my investigation, and telephone her on Thursday, August 14, 2014.

August 12, 2014 @ 0815 hrs; I telephoned Mr. Hoenig regarding the btu/hr rating for the propane dryer. Mr. Hoenig stated the dryer is custom built and he will call the manufacturer and call me back with the data.

At 1105 hrs; Ms. Yeatts telephoned me stating my voice message was garbled. I informed her of my observations and the potential violation. I arranged to telephone her with update on Thursday, August 14, 2014.